

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of:)	
)	
Lifeline and Link Up Reform and Modernization)	WC Docket No. 11-42
)	
Lifeline and Link Up)	WC Docket No. 03-109
)	
Federal-State Joint Board on Universal Service)	CC Docket No. 96-45
)	
Advancing Broadband Availability Through Digital Literacy Training)	WC Docket No. 12-23

**THE TELECOMMUNICATIONS REGULATORY BOARD OF PUERTO RICO'S
PETITION TO HOLD IN ABEYANCE THE BOARD'S PETITION TO OPT OUT OF
THE NATIONAL LIFELINE ACCOUNTABILITY DATABASE**

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August 21, 2013

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The Telecommunications Regulatory Board of Puerto Rico (“Board”) respectfully submits this Petition to Hold in Abeyance its Petition to Opt Out of the National Lifeline Accountability Database (“NLAD”) for a period of 28 days to allow new Board members time to analyze whether pursuing it Petition continues to be the approach that is most consistent with the Board’s goals and duties to expand telecommunications service in Puerto Rico.

BACKGROUND

In the Lifeline and Linkup Reform and Modernization Order (“Lifeline Reform Order”), the Commission modernized the Universal Service Fund’s Lifeline program to mitigate waste, fraud, and abuse. The Lifeline Reform Order set the framework for a National Database to identify duplicative Lifeline support. The order and corresponding rules permit states to “opt-out of the duplicates database requirements...if they certify one time to the Commission that they have a comprehensive system in place to check for duplicative federal Lifeline support that is as

at least as robust as the processes adopted by the Commission, and that covers all ETCs operating in the state and their subscribers.”¹

On November 30, 2012, the Board filed a Petition to Opt Out of the National Lifeline Accountability Database, and on February 7, 2013, filed a Supplement to Petition to Opt Out of the National Lifeline Accountability Database, in which it certified that it believes that it meets the standard adopted by the FCC and respectfully requested a waiver.

In support of its Petition, the Board demonstrated the progress it has made toward reducing duplicative Lifeline support in Puerto Rico, and identified certain differences between the format of Puerto Rico addresses and surnames and the format typically used in the mainland that would pose a challenge to effective implementation of the national database in Puerto Rico.

BASIS FOR PETITION

Since the time of the last filing, the structure of the Board has changed, expanding from three members to five members. Two new members, including a new Board President, have been appointed by the Governor of Puerto Rico, have been confirmed the Legislative Assembly, and have assumed their positions on the Board. It remains the duty of the Board to “preserve and promote universal service through predictable, specific and sufficient support mechanisms”² while ensuring that the Lifeline subsidy is limited to “a single wireline telephone line or to a single wireless service for the family unit.”³

In light of the complexities involved in maintaining a comprehensive system to meet the requirements set forth by the FCC’s Lifeline Reform Order and its subsequent Public Notice, the

¹ See *Lifeline and Link Up Reform and Modernization et al.*, WC Dkt. Nos. 11-42 *et al.*, CC Dkt. No. 96-45, Report and Order and Further Notice of Proposed Rulemaking, 27 FCC Rcd 6656 (2012), ¶ 221 (Lifeline Reform Order).

² 27 L.P.R.A. § 269e(a)(1).

³ 27 L.P.R.A. § 269e(d)(3).

competing issues related to normalizing the data format of Puerto Rico names and addresses with the requirements of the federal system, and the Board's duties under federal and Puerto Rico law, the Board requires a short period of time to study the issues and determine whether it should continue to pursue approval to opt out of the National Lifeline Accountability Database. The Board believes that a period of 28 days would be sufficient to allow it to determine which approach will best support its goals and duties to expand telecommunications service in Puerto Rico while fulfilling the mandates of the Lifeline Reform Order and the standards adopted by the Commission.

Accordingly, the Board requests that the FCC hold in abeyance its previously-filed petition to opt out of the National Lifeline Accountability Database for a period of 28 days from the date of this filing, or until September 18, 2013.

Dated: August 21, 2013

Respectfully submitted,

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